

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
RESPONSE TO UBER'S
SUPPLEMENTAL BRIEF IN SUPPORT
OF MOTION TO STRIKE TRADE
VAGUE AND OVERBROAD TRADE
SECRET CLAIMS AND EXHIBITS
THERE TO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Its Response to Uber’s Supplemental Brief in Support of Motion to Strike Vague and
8 Overbroad Trade Secret Claims (“Waymo’s Response”) and Exhibits Thereto, filed concurrently
9 herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the
10 following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Response	Highlighted portions	Waymo (green highlighting), Defendants (blue highlighting)
Exhibits 1-3 to the Jaffe Declaration	Entire documents	Defendants; Waymo (green highlighting)

16 3. Specifically, the green highlighted portions of Waymo’s Response and Exhibits 2-3
17 contain or refer to trade secret information, which Waymo seeks to seal.

18 4. The green highlighted portions of Waymo’s Response and Exhibits 2-3 contain,
19 reference, and/or describe Waymo’s trade secrets. The information Waymo seeks to seal includes the
20 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, including
21 its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are
22 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s
23 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
24 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
25 information were made public, I understand that Waymo’s competitive standing would be
26 significantly harmed.
27
28

5. Waymo's request to seal is narrowly tailored to those portions of Waymo's Response and Exhibits 2-3 that merit sealing.

6. Waymo only seeks to seal the portions of Waymo's Response (highlighted blue) and Exhibits 1-3 identified in the table above because Waymo believes such information is considered confidential or non-public by Defendants.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 1, 2017.

By /s/ *Felipe Corredor*

Felipe Corredor

Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

/s/ Charles K. Verhoeven

Charles K. Verhoeven